

Reference: The Bottleneck Around Counselling and Psychotherapy

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APA is requesting support in relation to ending the revenue based coercion and manipulation of Qualified Therapeutic Professionals in the sphere of Counselling and Psychotherapy.

Thousands of Qualified Therapeutic Professionals are experiencing restrictive recruitment and indirect discrimination based on their affiliation to Voluntary Registers. This is causing a **BOTTLENECK THAT DIRECTLY RESULTS IN LOSS OF LIFE.**

With many employers unaware of the legal extent and, responsibilities of Charities, that hold a VOLUNTARY REGISTER, in this arena many are unwittingly being misled into maintaining this discriminatory manipulation, which is outside the protection of employment law.

APA has encouraged organisations that financially benefit from this coercion to publicly clarify the limit of their role and responsibilities as they extend, only to that of a charity with a VOLUNTARY register, not that of a Regulatory, Governing or Professional Body. The only formal response received, was from the largest charity in the sector.

“I have discussed [REDACTED] accreditation with our Workforce Policy team to gain some clarification. [REDACTED] do not insist that organisations specify accredited [REDACTED] members for specific roles, employers are at liberty to set and apply their own criteria / standards for recruitment – within the scope of the law – which [REDACTED] are not accountable for....

...It is certainly not our aim to make anyone believe we are a governing body, nor is this something we have ever stated, it wouldn't be beneficial to our members if we tried to affect their financial wellbeing.

We do recognise that our members are our existence and [REDACTED] is working to ensure we're providing the best service possible as a membership organisation. Due to this we do not feel it would be necessary to make a public statement as you have requested.”

Yet APA Executives have witnessed Senior Executives publicly present this same charity as “The ONLY Professional Body that ALL ETHICAL COUNSELLORS MUST BE CONNECTED TO.”

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APA accepts that the term 'Governing body' is not used in this example. However, when 'Professional Body', and similar phraseology is used to the public, the inference, is clearly an attempt to elevate the perception of the charities authority in the sector. Mis-representation is unethical, and at best, a breach of Guidelines for Voluntary Registers, Charities, and even Businesses, at worst, it is deliberate and fraudulent .

APA will show that the mis-representation and the wilful acceptance of the mis-perception has permeated across the sector and is adversely impacting not only on the professionals that are restricted from employment, but that the Bottleneck has been applied to the National Health Service too, preventing thousands of people from accessing Mental Health Support at the point of need. This impact is the most unethical of all, as it is this restriction that is causing extensive waiting lists for Mental Health support in the NHS's history and subsequently deaths whilst people wait for support, as suicides are spiralling ever upwards.

When an organisation knowingly accepts the financial benefits of a mis-perception, it stops being an arbiter of ethical practice, when that organisation deliberately mis-represents itself, it becomes the perpetrator of unethical conduct, for financial gain. That should be abhorrent to all those that work to ensure, ethical conduct is a baseline of standards. This should only be amplified in the field of mental health.

Therefore, with every best intention for the protection, and service of the public and the professionals, who have been prevented from applying for employment, (that they are qualified to undertake), we request that the Professional Standards Authority (PSA) makes a clear and direct public clarification, in relation to:

- The Baseline for Qualified Therapeutic Professionals.
- The roles of organisations that hold VOLUNTARY Registers.

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The restrictive recruitment that has so far, been unchallenged by the Voluntary registers is neither ethical nor protected under UK employment law. Mandating affiliation to any entity outside of a 'Governing Body' in APA's view is potentially leaving employers open to legal action, and even if they are not perpetuating the restrictive recruitment situation, Voluntary registers are wilfully, and knowingly profiting from it, at the expense of professionals and ultimately members of the public that are increasingly reaching out for support.

Following a recent meeting with NHS Kent with regards to improving public access to Qualified Therapeutic Professionals via the National #111 Service by removing the Bottleneck, the following response was given.

...the national standards for IAPT outlined in the manual are really clear about workforce requirements and interventions offered. Two key points are summarised ...

- Counsellors meet NHSEI standards of training and accreditation.
- Any interventions offered are NICE approved or been subject to randomised control trial research.

It is clear to see from this response that the perception of a Voluntary Registers authority has been widely over played. While 'NICE' are authorising the UK's largest single employer, in the arena of Mental Health to unethically prevent qualified therapeutic professionals from plying their trade, it is little wonder that NHS trusts are recruiting from the smallest collection of potential employees, and recruitment advert such as the one below are prevalent.

Sussex, Brighton BN2

Psychological Therapist – IAPT Counsellor

Sussex Community NHS Foundation Trust

£32,306 - £39,027 a year

This is an exciting development opportunity for counsellors looking to start or progress their career within the NHS.

If you are an accredited counsellor and want to work with a range of NHS patients in primary care, then we have an opportunity for you to join our Time to Talk IAPT (Improving Access to Psychological Therapies) service in SCFT (Sussex Community NHS Foundation Trust).

Requirements

1. Qualification: Applicants must have a recognised professional qualification to diploma level in counselling or psychotherapy and must be accredited with the BACP or UKCP. (This means you must have completed your course and worked sufficient clinical hours to meet your organisations' accreditation standards).

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The Baseline for Qualified Therapeutic Professionals.

Qualified Therapeutic Professionals in the sphere of Counselling and Psychotherapy must meet a minimum baseline, long accepted by the sector. A qualified Counsellor / Psychotherapist is qualified to work with clients upon attaining.

A Diploma (Level 4) in Counselling and / or Psychotherapy, that involves approximately 450 hours of direct tutor led studying. (Between 2 and 5 years study P/T).

Diplomas are invariably passed on completion of supporting feedback from.

1. A tutor or tutors.
2. Placement Manager. (Minimum 100 hrs of structured placement experience)
3. Group Supervisor.
4. Individual Supervisor.

For the protection of Best Practice, students studying this topic will also have been through their own therapy and ethical best practice would ensure that Individual Supervision is maintained following Qualification. [Supervision should not be confused with case management in organisational settings]

The roles of organisations that hold VOLUNTARY Registers.

- ☆ NO VOLUNTARY REGISTER OR CHARITY PROVIDES A REGULATORY STANDARD.
- ☆ NOR CAN QUALIFIED PROFESSIONALS BE LEGALLY MANDATED TO BE AFFILIATED TO VOLUNTARY REGISTERS.
- ☆ QUALIFIED PROFESSIONALS CANNOT LEGALLY BE PREVENTED OR REMOVED FROM EMPLOYMENT ON THE GROUNDS OF AFFILIATION OR NON-AFFILIATION TO A VOLUNTARY REGISTER.
- ☆ QUALIFIED IS QUALIFIED, AFFILIATION / ACCREDITATION DOES NOT EQUAL QUALIFIED.

Affiliation to a VOLUNTARY REGISTER IS THE PREFERRED STATUS OF ALL QUALIFIED THERAPEUTIC PROFESSIONALS. However, this is not a legal requirement or the role of an employer to mandate the register an employee is affiliated too. Whilst preference may be given on grounds of logistical and operational awareness, APA encourages all employers to verify the Ethical Standards of ALL VOLUNTARY Registers as part of their own due diligence.

APA is requesting that the unethical manipulation, in-direct discrimination, and coercive environment that currently exists is ended. ONLY by raising the awareness among those that impact change can an ethical environment be created. It is clear that the long established registers in this area, have benefited from a mis-perception and that must end.

APA will release a public statement before the end of the year, in relation to this issue, we hope that the PSA will act, in advance of our statement to ensure that all PSA Registrants are encouraged to actively increase their transparency, regarding 'NOT BEING GOVERNING OR REGULATORY BODIES' By way of APA's transparency, We declare that the agencies and individuals listed below will be contacted in advance of our public statement and informed of the fact, regarding the role and responsibilities that extend to the charities, organisations and other bodies (including APA) that hold a VOLUNTARY register, in the arena of Counselling and Psychotherapy.

THE RECIPIENTS:

DIRECT RECIPIENTS: Week of 13th December 2021

No.10 Downing Street, Gillian Keegan - Minister of State (Minister for Care and Mental Health), Kevin Stewart - Minister for Mental Wellbeing and Social Care (Scotland), Professor Siobhan O'Neill - Mental Health Champion for Northern Ireland, Lynne Neagle MS - Deputy Minister for Mental Health and Wellbeing (Wales), IAPT, NHS UK, National Institute for Clinical Excellence (NICE), Institute of Directors (IoD), Chamber of Commerce UK, Dept of Education, HM Parliament, UCAS, Psychotherapy & Counselling Union (PCU), Chartered Institute of Personal Development (CIPD), The Association of Recruitment Consultancies (ARC), UK Regional Parliaments, Local Government Association, Parliamentary Select Committee on Mental Health, Home Office.

MEDIA: Week of 31st January 2022

BBC, ITN, Associated Press, Sky News, Channel 4 News, Channel 5 News, GB News, Daily Mirror, Sunday Mirror, The People, Daily Express, Daily Mail, The Guardian, The Observer, The Times, The Sunday Times, The Sun, The Daily Telegraph, Metro, The Herald, British Association of Journalists.

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It should be noted that APA applauds all Qualified Therapeutic Professionals that engage in ethical delivery of support to those in need, at the point of need. APA respects their freedom to choose the Voluntary Register that meets their expectations and support needs.

We openly encourage all professionals to demonstrate the best of their Therapeutic knowledge and self-awareness in these difficult and challenging times.

That said, the management and execution of ethical frameworks, by charities and organisations that hold VOLUNTARY Registers should not be permitted to act or benefit from unethical representation or mis-perceptions of their roles and responsibilities.

In light of the amplified Mental Health Crisis, brought on by the Covid-19 Pandemic, it is vital that every Qualified Therapeutic Professional is able to support those in need.

APA has called for the Mobilisation of Qualified Therapeutic Professional as a response to the clear state of emergency that exists within the UK. We implore the PSA and other relevant agencies to act with all urgency to end the Bottleneck Around Counselling and Psychotherapy and allow all professionals to exercise their right to employment without restriction, coercion, or manipulation.

